

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No. M-24-CR-0168
	§	
JORGE SALINAS aka "COACH"	§	

**JOINT MOTION TO SET DATE CERTAIN
FOR PREFERENTIAL TRIAL DATE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, by and through its United States Attorney and undersigned Assistant United States Attorney, and would respectfully show the Court the following:

The above-styled and numbered cause is assigned to United States District Judge Drew B. Tipton and is set for a Final Pretrial Conference on June 17, 2024, before United States Magistrate Judge Juan F. Alanis. The parties anticipate announcing a trial announcement request that this Court set a preferential trial setting for August 5, 2024, in order to allow the parties to fully prepare the evidence for trial, as well as to explore potential plea negotiations in the interim.

This case involves extensive electronic evidence as well as likely testimony from several out of state witnesses. In order to efficiently present the case to the Court and the jury, both parties are requesting a preferential trial date on August 5, 2024, in order to prepare the evidence for trial.

The Government anticipates the trial should take no more than a week. The parties do not make this request for the purpose of delay but only so that the entirety of the evidence may be presented to the jury at the time of trial.

The parties respectfully request a Final Pretrial Conference be set and that jury selection and trial be preferentially set to begin August 5, 2024.

Respectfully submitted,

ALAMDAR S. HANDANI
UNITED STATES ATTORNEY

/s/Robert Guerra

Robert Guerra
Assistant United States Attorney

ATTORNEY FOR JORGE SALINAS

/s/Jesus Villalobos

Jesus Villalobos, Jr.
Villalobos & Villalobos, P.C.

CERTIFICATE OF CONFERENCE

On June 11, 2024, the undersigned attorneys for the Government, Robert Guerra, and for defendant, Jesus Villalobos, Jr. consulted with each other and agreed to file this joint motion.

/s/Robert Guerra

Robert Guerra
Assistant United States Attorney

/s/Jesus Villalobos

Jesus Villalobos, Jr.
Villalobos & Villalobos, P.C.

CERTIFICATE OF SERVICE

The undersigned certifies that on this the June 11, 2024, a true and correct copy of the foregoing Motion was provided to counsels for the parties.

/s/Robert Guerra

Robert Guerra
Assistant United States Attorney

/s/Jesus Villalobos

Jesus Villalobos, Jr.
Villalobos & Villalobos, P.C.